Foreword Version: 1.2.0

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Portland Packaging Plant



Prepared for:

Pennzoil-Quaker State Company dba SOPUS Products (Shell Lubricants)
P.O. Box 4427
Houston, Texas 77210-4427

Prepared by:

Witt O'Brien's

818 Town & Country Blvd., Suite 200 Houston, TX 77024-4564 Phone: (281) 320-9796 | Fax: (281) 320-9700 wittobriens.com Foreword Version: 1.2.0

PROFESSIONAL ENGINEER CERTIFICATION

By means of this Professional Engineer Certification, I hereby attest, to the best of my knowledge and belief, to the following:

- I am familiar with the requirements of 40 CFR Part 112 and have verified that this Plan has been prepared in accordance with the requirements of this Part.
- I or my agent have visited and examined the Facility on . My certification is based upon the condition of the Facility as of this date. Any material changes to the Facility made subsequent to this date must be separately reviewed, documented and P.E. certified as a Technical Amendment, as appropriate.
- I have verified that this Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards.
- I have verified that the required inspection and testing procedures have been established as described in this Plan.
- I have verified that the Plan is adequate for the Facility.
- My certification of this Plan in no way relieves the owner/operator of the Facility(s) of their duty to
 prepare and fully implement the Plan in accordance with the requirements of 40 CFR Part 112. I in no
 way assume any liability of whatsoever kind or nature by my certification.
- The owner/operator, by "Management Approval" located on the following page, acknowledges this certification and the compliance measures described herein.
- This Plan is valid only to the extent that the Facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this Plan and completes any implementation requirements.

(Seal)

Registered Professional Engineer

Gaghanale



State of Texas

Commission Expires:

Registration No: 101909

Date of Seal/Signature: 7/20/2012

9/30/2012

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PROFESSIONAL ENGINEER CERTIFICATION FOR SPECIFIC FACILITY MODIFICATIONS

Facility Modification

Date of Review:

May 29, 2013

Description of Change:
 Removal of Tank 16.

05/30/2013

• Impact of Change: No negative effect to compliance of this SPCC Plan.

Professional Engineer Certificate

• I have evaluated the change in Facility design and have determined that it does not materially affect the Facility's potential for a discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

• The Plan, as it currently stands, and the original certification therein remains effective as provided with the exception noted above which is further certified below.

(Seal)

Registered Professional Engineer

Ralph Charit



Date of Seal/Signature:

State of Texas

Registration No: 75161

Commission Expires:

3/31/2014

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MANAGEMENT APPROVAL

Owner/Operator Responsible for Facility:

Pennzoil-Quaker State Company dba SOPUS

Pennzoil-Quaker State Company dba SOPUS

Products (Shell Lubricants)

Facility Name: Portland Packaging Plant

Facility Address: 440 N. Columbia Boulevard Portland, Oregon 97217

• By signature below, the Manager approves this Plan and acknowledges that the elements identified within this Plan have been implemented.

• This page may be used for the initial Management Approval or for subsequent change of management and/or change of designated person accountable.

• This SPCC Plan will be implemented as herein described.

Signature:

Name: Todd M. Colwell

Date: 10/19/2012

Title: Plant Manager

Designated Person Accountable for Oil Spill Prevention at the Facility:

Name: Victor Clinton

Title: Maintenance Supervisor

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FIVE (5) YEAR MANAGEMENT REVIEW

The function of this log is to document Management's five (5) year review of the Plan as required under 40 CFR 112.5. All revisions that occur as a result of this review will be documented on the "Revision Record" that follows this page.

Acknowledgment of Five (5) Year SPCC Plan Review Completion

- As required by 40 CFR Part 112.5(b), Management will review this SPCC Plan at least each five (5) years and document the review on the form below.
- This review includes an evaluation of more effective prevention and control technology that would significantly reduce the likelihood of a spill event from the Facility.
- By signature below, signee confirms that management has completed a review and evaluation of this SPCC Plan.
- As a result of this review and evaluation, technical changes in Facility design, construction, operation, or maintenance that would materially affect the Facility's potential for discharge into navigable waters of the United States or adjoining shorelines will be recertified by a registered Professional Engineer. Documentation of such revisions will be recorded in the "Revision Record" located in the Foreword.
- If no amendment is required, date, sign, and indicate the Plan "will not" be amended using the appropriate space.

ADDITION	NAL PREVENTION AND CONTROL TEC	HNOLOGY
Signature:	:	-
Title:		-
Review Date:		-
Amend Plan:		-

Fwd-5

Revision Date: June, 2013

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inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.	CERTIFICATION OF THE APPLICABILITY OF THE EPA SUBSTANTIAL HARM CRITERIA				
Portland, Oregon 97217 1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage Yes	FACILITY NAME:	Portland Packaging Plant			
1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage Yes	FACILITY ADDRESS:	440 N. Columbia Boulevard			
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest paboraground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil ves		Portland, Oregon 97217			
facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil ves	Does the facility transfer oil or capacity greater than or equal to	ver water to or from vessels <u>and</u> does the facility have a total oil storage Yes No			
located at a distance (as calculated using the appropriate formula in Attachment C-III to 40 CFR Part 112 or a comparable formula1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (59 FR 14713, March 29, 1994) and the applicable Area Contingency Plan. 4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to 40 CFR Part 112 or a Yes	facility lack secondary contair aboveground oil storage tank pl	ment that is sufficiently large to contain the capacity of the largest			
located at a distance (as calculated using the appropriate formula in Attachment C-III to 40 CFR Part 112 or a Yes	located at a distance (as calcula comparable formula1) such tha sensitive environments? For for Appendices I, II, and III to DOC	ted using the appropriate formula in Attachment C-III to 40 CFR Part 112 or a t a discharge from the facility could cause injury to fish and wildlife and urther description of fish and wildlife and sensitive environments, see Yes			
1. If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form. 2. For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c). I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete. Plant Manager Title Todd M. Colwell 10/19/2012	located at a distance (as calcula	ted using the appropriate formula in Attachment C-III to 40 CFR Part 112 or a Yes No No			
attached to this form. 2. For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c). I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete. Plant Manager Title Todd M. Colwell 10/19/2012	Does the facility have a total oil sexperienced a reportable oil spill in	storage capacity greater than or equal to 1 million gallons <u>and</u> has the facility Yes No No			
Plant Manager Signature Todd M. Colwell 10/19/2012	attached to this form. 2. For the purposes of 4				
Signature Title Todd M. Colwell 10/19/2012	, ,				
Signature Title Todd M. Colwell 10/19/2012	Full	Plant Manager			
Name Date	Todd M. Colwell	10/19/2012			
	Name	Date			

NOTE: The information and procedures in this Plan must be treated as guidelines only. The user should determine to what extent it is practical and advisable to follow them. This decision may involve considerations not discussed in this Plan. O'Brien's Response Management Inc. (O'Brien's) provided consulting and plan development services in the preparation of this plan utilizing data provided by the owner/operator and/or the Facility. O'Brien's assumes no liability for injury, loss, or damage of any kind resulting directly or indirectly from the use of the regulatory interpretation, response planning, or information contained in this plan.

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NOTE: It is the responsibility of the holder of this Plan to ensure that all changes and updates are made. The Plan Holder must:

- Remove and discard obsolete pages.
- Replace obsolete pages with the updated pages.

REVISION RECORD				
CHANGE DATE	AFFECTED PAGE NUMBER(S)	DESCRIPTION OF CHANGE(S)		
May 2013	diagram	Removal of Tank 16, Revision Record, Tank Table and insert new site diagram.		
June 2013	Entire Plan	Misc. changes		

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	DISTRIBUTION LIST			
COPY NUMBER PLAN HOLDER				
1	Shell Lubricants Packaging Plant Todd M. Colwell 440 North Columbia Blvd. Portland, Oregon 97217			
2	Shell Lubricants Regional Environmental Engineer PO Box 4427 Houston Houston, Texas 77210-4427			
Shell Lubricants ePlanPro (r) System	Shell Lubricants ePlanPro(r) Enterprise System Accessible to all Responsible Personnel Hosted Online			

1.0 Introduction and Plan Content Version : 1.2.0

SECTION 1.0

INTRODUCTION AND PLAN CONTENT

- 1.1 Introduction
- 1.2 Plan Purpose/Objectives
- 1.3 Plan Distribution Procedures
- 1.4 Plan Review and Update Procedures
- 1.5 Regulatory Compliance
- 1.6 <u>Conformance With Other Requirements</u>

1.0 Introduction and Plan Content Version: 1.2.0

1.1 INTRODUCTION

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been developed in accordance with the regulatory requirements of 40 CFR Part 112 (EPA) for Pennzoil-Quaker State Company dba SOPUS Products (Shell Lubricants), Portland Packaging Plant, (hereinafter referred to as "Facility"). Appendix A of this Plan details Facility-specific information, including information on potential spill sources, containment areas, and facility diagrams.

Blending Operations

Blending of lube oils is performed in nine kettles (ASTs) or by using the in-line blender. Materials are pumped from storage tanks in the tank farm to the interior kettles or in-line blender. Finished product is pumped back to tanks in the tank farm, to holding tanks or to out-bound trucks after the blending process is completed. Having operations blending procedures and trained personnel minimize the risk of releases during the blending process. The hours of operation are Monday - Friday 5 a.m. to 5 p.m.

Manufacturing Activities

Manufacturing activities include blending and product packaging in the main building, in the blending building and in two blending canopy areas.

Blending takes place in the blending building and in two blending canopy areas.

The packaging area is located in the main facility building. Bottles, totes, drums, kegs and pails are all filled in the product packaging area.

Main Warehouse/Warehouse B/Hot Room

The Main Warehouse is located inside the main building while Warehouse B and the Hot Room are located adjacent to the Main Warehouse. Warehousing operations in the Main Warehouse and in Warehouse B involve movement and short-term storage of finished oil products in 55-gallon drums or tote tanks by fork trucks. Totes in the warehouse areas typically each have a maximum capacity of 330 gallons. The Hot Room is used to store lube oil additive drums and totes that have a maximum capacity 550 gallons.

Facility Layout

The following are potential discharge sources at this facility. Exact locations are illustrated in Appendix A. A table summarizing potential discharge sources, range and/or average quantity stored, where they are stored, and containment for each potential discharge source is provided in Appendix A.

- Aboveground Storage Tank (AST) Farm;
- 2. Tank Truck Loading/Unloading Area;
- 3. Rail Car Loading/Unloading Area;
- 4. Package Truck Loading/Unloading Areas, including auxiliary tanks;
- 5. Flush/Mixed Oil Storage Areas;
- 6. Manufacturing Areas;
- 7. Main Warehouse/Warehouse B/Hot Room;

- 8. Canopy Storage Area;
- 9. Parking Lot; and
- 10. Temporary Outdoor Portable Storage Containers.

1.0 Introduction and Plan Content Version: 1.2.0

1.2 PLAN PURPOSE/OBJECTIVES

This SPCC is intended to provide a ready reference and guide to assist Facility personnel in establishing and maintaining an efficient and effective prevention, control, and countermeasure program for potential discharge incidents from the Facility.

The specific objectives of the Plan are to define the typical company and specific Facility spill prevention, control, and countermeasure practices and procedures, as applicable, including:

- Designated Person Accountable for Oil Spill Prevention;
- Training and Inspection Programs;
- Facility Drainage;
- Bulk Storage Containers;
- Transfer Operations, Pumping, and In-Plant Processes;
- Loading/Unloading Areas and Racks; and
- Security.

1.3 PLAN DISTRIBUTION PROCEDURES

Company Management will coordinate distribution of the Plan. Distribution will be handled in the following manner:

- Distribution of controlled Plans is determined by the copy number assigned to designated Plan Holders. A Distribution List is included in the Foreword.
- The Facility maintains a complete copy of the Plan at the Facility, as it is attended at least four (4) hours each day. The Plan will be available to the EPA Regional Administrator for on-site review during normal working hours.

1.4 PLAN REVIEW AND UPDATE PROCEDURES

The "Designated Person Accountable for Oil Spill Prevention" (identified on the Management Approval Page in the Foreword), with support from the Maintenance Supervisor, will coordinate the following Plan review and update procedures.

Technical Amendment

• **Technical amendments** are certified by a Registered Professional Engineer and documented in the "Revision Record" located in the Foreword. Amendments will be detailed with a stand-alone certified technical PE Certification page behind the initial "Professional Engineer Certification".

- This Plan will be revised when there are changes in the Facility's design, construction, operation, or maintenance that materially affects the Facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. Such amendments shall be fully implemented as soon as possible, but not later than six (6) months after such change occurs.
- The "Designated Person(s) Accountable for Oil Spill Prevention" will notify Company Management of any such technical change(s).

Changes requiring revision may include, but are not limited to:

- Commissioning or decommissioning of containers.
- Replacement, reconstruction, or movement of containers.
- Reconstruction, replacement, or installation of non-transportation-related piping systems.
- Construction or demolition that might alter secondary containment structures.
- Changes of product or service.
- Revision of standard operating or maintenance procedures at the Facility.

Non-Technical Amendments

• **Non-technical amendments** are not certified by a Registered Professional Engineer and are documented in the "Revision Record" located in the Foreword.

Changes requiring revision may include, but are not limited to:

- Phone numbers;
- Personnel changes; and
- Non-technical text changes.

Plan Review

• At least once each five (5) years, the Facility will complete a review and evaluation of this SPCC Plan. Based upon the results, make any amendments within six (6) months of the review and implement the amendments, as soon as possible, but not later than six (6) months following preparation of any amendment.

• This will include, at a minimum, a review of more effective prevention and control technology, which may significantly reduce the likelihood of a discharge event from the Facility, if such technology has been field-proven at the time of the review.

1.5 REGULATORY COMPLIANCE

This Plan addresses the following regulatory requirements:

• Federal Spill Prevention, Control, and Countermeasure Regulation: U.S. EPA Final Rule for Oil Pollution Prevention; Non-Transportation Related On-shore and Offshore Facilities (40 CFR Part 112).

A detailed cross reference between the format of this Plan and that of the applicable regulations is provided in the Regulatory Cross Reference at the end of the Plan.

General Applicability

These requirements apply to owners or operators of non-transportation-related onshore and offshore facilities engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, and that meet each of the following criteria:

- Due to their location, could reasonably be expected to discharge oil in harmful quantities into or upon the navigable waters of the United States or adjoining shorelines; and
- Has an aggregate aboveground storage capacity in excess of 1,320 gallons excluding containers less than 55 gallons; or
- Has an underground storage capacity in excess of 42,000 gallons and not subject to the technical requirements of 40 CFR Part 280 or 281.

SPCC Documentation

The Facility shall submit the following information as required by 40 CFR Part 112.4 to the EPA Regional Administrator within sixty (60) days whenever the Facility has a discharge event(s) which meets one of the following conditions:

- Discharge more than 1,000 gallons of oil (or oil products) into or upon the navigable waters of the United States or adjoining shorelines in a single spill event **or**,
- Discharges more than 42 gallons of oil (or oil products) into the navigable waters of the United States in two (2) spill events within any twelve (12) month period.

Documentation to be included within this submission includes the following:

- Name of the facility;
- Name(s) of the owner or operator of the facility;
- Location of the facility;

1.0 Introduction and Plan Content

- Maximum storage or handling capacity of the facility and normal daily throughput;
- The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements;
- Description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- The cause(s) of such spill, including a failure analysis of system or sub-system in which the failure occurred:
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence;
- Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event.

1.6 CONFORMANCE WITH OTHER REQUIREMENTS

The State of Oregon does not have more stringent requirements.

SECTION 2.0

NOTIFICATION AND RESPONSE PROCEDURES

- 2.1 Countermeasures
- 2.2 <u>Internal Notifications</u>
- 2.3 External Notifications
 - Figure 2.1 <u>Internal Notification References</u>
 - Figure 2.2 External Notification References
 - Figure 2.3 Notification Data Sheet
- 2.4 Response Procedures
- 2.5 <u>Disposal Methods</u>
- 2.6 **Prevention**

This Section includes notification and response procedures that should be implemented immediately after discovering a discharge incident and securing the source (if at all possible). All notifications are of extreme importance and must be completed in a timely manner.

2.1 COUNTERMEASURES

The Facility discharge discovery, response, and cleanup capabilities are described as follows:

- The discharge discovery capabilities of the Facility are provided by the engineering controls (see Sections 4, 5, 6, 7, and 8) and the training and inspection programs (see Section 3) in place at the Facility.
- The discharge response and notification capabilities of the Facility have been summarized in this Section.
- The Facility has a Facility Response Plan (FRP) in accordance with 40 CFR 112.20 (spill response plan) in place which provides considerable detail of the Facility's response capability including notification procedures, response actions, clean-up capabilities (including contractor capabilities), response equipment available at the Facility, response team organization and identification of environmental and socioeconomic sensitivities.
- Oil Spill Response Contract Agreements are located at the Facility and/or in the FRP.

2.2 INTERNAL NOTIFICATIONS

First Company Person Notified/On-Scene

Employees will notify supervisor or the plant manager when they discover a release or spill.

Based on site conditions, the Company-designated liaison will then make the necessary internal notifications. A telephone reference is provided in Figure 2.1.

2.3 EXTERNAL NOTIFICATIONS

The external notifications should be made in accordance with federal, state, and local regulations for all reportable discharges. A telephone reference is provided in Figure 2.2. A "Notification Data Sheet" (Figure 2.3) should be used to facilitate documentation and data retrieval for these notifications.

FIGURE 2.1 INTERNAL NOTIFICATION REFERENCES

INTERNAL NOTIFICATION REFERENCES - GENERAL					
FACILITY ADDRESS OFFICE FAX NO					
Portland Packaging Plant	440 N. Columbia Boulevard Portland, Oregon 97217	(503) 283-6108	(503) 286-4494		

INTERNAL NOTIFICATION REFERENCES						
NAME/ POSITION/TITLE OFFICE HOME OTHER						
Todd Colwell Plant Manager	(503) 283-6107	(b) (6)	(b) (6) CELL			
Victor Clinton Blending/Maintenance Supervisor	(503) 283-6113		(b) (6) CELL			

FIGURE 2.2 EXTERNAL NOTIFICATION REFERENCES

SPILL REPORTING GUIDELINES

- Never include information which has <u>not been verified</u>.
- Never speculate as to the cause of an incident or make any acknowledgment of liability.
- DOCUMENT:
 - Agency notified;
 - Time agency notified;
 - Person notified;
 - Content of message given; and
 - Follow-up requirements.
- **DO NOT DELAY** reporting due to incomplete information.

OIL SPILL REMOVAL ORGANIZATIONS

USCG CLASSIFIED OIL SPILL REMOVAL ORGANIZATIONS (OSRO)					
COMPANY LOCATION PRIMARY ALTERNATE					
Cowlitz Clean Sweep	Longview, Washington	(888) 423-6316	(360) 423-6316		
Clean Harbors Environmental	Clackamas, Oregon	(503) 785-0404			

FEDERAL, STATE, AND LOCAL AGENCIES				
AGENCY	LOCATION	PRIMARY	ALTERNATE	
City of Portland Emergency Response System	Portland, Oregon	(503) 823-4375		
Oregon OSHA	Portland, Oregon	(503) 229-5910		
U.S. Environmental Protection Agency Region X	Seattle, Washington	(206) 553-1263		
USCG Sector Portland	Portland, Oregon	(503) 861-6212		
National Response Center (NRC)	Washington, District Of Columbia	(800) 424-8802	(202) 267-2675	
Oregon Emergency Response System (OERS)	Salem, Oregon	(800) 452-0311	(503) 378-6377	
Oregon Department of Environmental Quality	Portland, Oregon	(503) 229-5696	503-229-5630	
City of Portland Environmental Services	Portland, Oregon	(503) 823-7180		
Multnomah County Health Department	Portland, Oregon	(503) 823-4000		
Multnomah County Transportation, Fleet, Env. Comp.	Portland, Oregon	(503) 988-5050		
OR Dept. of State Police EMD	Oregon	(800) 452-0311 in state)/(503)378-6377 (out of stat		
Oregon Department of Transportation Region 1	Portland, Oregon	(503) 731-8200		

FEDERAL, STATE, AND LOCAL AGENCIES (Cont'd)				
AGENCY	LOCATION	PRIMARY	ALTERNATE	
Oregon Emergency Management	Salem, Oregon	(503) 378-2911	(503) 229-5256	
Oregon LEPC / State Fire Marshall	Salem, Oregon	(503) 373-1540		
Port of Portland	Portland, Oregon	(503) 944-7000		
Port of Portland Marine Security Terminal 6	Portland, Oregon	(503) 240-2230		
Portland Water Bureau Repair	Portland, Oregon	(503) 823-4874		
Seattle Audubon Society	Seattle, Washington	(206) 523-4483		
State Emergency Management Division	Dacoma, Washington	(800) 258-5990	(253) 912-4901 / 4902 / 4904 / 4906	
Washington Department of Ecology	Olympia, Washington	(360) 407-6300		
Washington Department of Fish and Wildlife	Olympia, Washington	(360) 902-2200		

OTHER EXTERNAL CONTACTS				
COMPANY/AGENCY	LOCATION	PRIMARY	ALTERNATE	
Allwaste Environmental	Portland, Oregon	(503) 282-8234		
Ambulance	Portland, Oregon	911		
American Medical Response	Portland, Oregon	(503) 282-2232		
City of Portland Fire Bureau	Portland, Oregon	911 / (503) 823-3700		
City of Portland Police Bureau Non-emergency Resp.	Portland, Oregon	911 / (503) 823-3333 (Dispatch)		
CURA Emergency Services	Plano, Texas	(800) 579-2872		
Legacy Good Samaritan Hospital & Medical Center	Portland, Oregon	(503) 413-7711		
Multnomah County Sheriff's Office Enforcement Div.	Portland, Oregon	911 / (503) 255-3600		
Oregon Dept. of State Police,Portland Area Command	Portland, Oregon	(503) 731-3020		
Portland Fire and Rescue	Portland, Oregon	(503) 823-3700		
Shell Oil Products US Emergency Hotline	Texas	(877) 242-7400		

FIGURE 2.3 NOTIFICATION DATA SHEET

Date of Incident:	NOTIFICATION DATA SHEET Date of Incident: Time of Incident:					
	INCID	DENT DESCRIPTION				
Reporter's Full Name		Position:				
Day Phone Number:		Evening Phone Nu	mhor:			
Day Frione Number.	Pennzoil-Quaker State	Lverling i none Nu				
Company:	Company dba SOPUS Product (Shell Lubricants)	cts Organization Type.				
Facility Address:	440 N. Columbia Boulevard	Owner's Address:	P.O. Box 4427			
	Portland, Oregon 97217		Houston, Texas 77210-4427			
Facility Latitude:	45°35'45"N	Facility Longitude:	122°41'14"W			
Spill Location (if not a	at Facility):					
Responsible Party's N		Phone No	ımber:			
Responsible Party's A	Address:					
Source and/or cause	of discharge:					
Nearest City:						
County: Multnomah	State:		Zip Code: 97217			
Section:	Township:		Range:			
Distance from City:		Direction from City:				
Container Type:		Container Storage (Capacity:			
Facility Oil Storage C	Capacity:					
Material:						
Total Quantity	y Released Wa	ater Impact (YES or NO)	Quantity into Water			
Weather Conditions:						
		PONSE ACTION(S)				
Action(s) taken to Co	rrect, Control, or Mitigate	e Incident:				
Manuel an a Chairmin		M				
Number of Injuries: Evacuation(s):		Number of I Number Eva				
Damage Estimate:		Number Eve				
More info. about imp	acted medium:					
		ER NOTIFICATIONS				
National Response Ce	enter (NRC): 1-800-424-88					
· -	ns (Circle all applicable)		SHA State Other			
		ONAL INFORMATION				
Any information abou	ıt the incident not record		oort:			
NOTE: DO N	OT DELAY NOTIFICATION	ON PENDING COLLECTION	ON OF ALL INFORMATION.			

2.4 RESPONSE PROCEDURES

Initial response actions are those taken by local personnel immediately upon becoming aware of a discharge or emergency incident. Timely implementation of these initial steps is of the utmost importance because they can greatly affect the overall response operation.

It is important to note that **these actions are intended only as guidelines**. The appropriate response to a particular incident may vary depending on the nature and severity of the incident and on other factors that are not readily addressed. Note that, **without exception**, **personnel and public safety is first priority**.

The first Company person on scene will function as the Person-in-Charge (PIC) until relieved by an authorized supervisor. Transfer of command will take place as more senior management respond to the incident.

INITIAL RESPONSE ACTIONS - SUMMARY

- Assume responsibility and control of the situation.
- Assess the incident Personnel and Public Safety is first priority. Provide immediate aid to the injured.
- Eliminate any sources of ignition.
- Isolate the source of a discharge, eliminate, or minimize further flow and initiate containment.
- Conduct immediate notification to activate the alarm system and mobilize the Spill Management Team or Local Response Team, Fire Department, Oil Spill Response Team, or Hazmat Team as necessary.
- Notify federal/state/local agencies and other contacts per notification tables in Section 2 (NRC, OSC,etc.).
- Control the area Evacuate as needed and prevent personnel from entering the area until trained responders have arrived.

2.5 DISPOSAL METHODS

The Facility has established the following methods of disposal for recovered materials in accordance with applicable legal requirements:

- The primary option is to recycle any product as circumstances allow.
- If recycling product is not an option, the recovered products will be segregated into the
 appropriate waste streams (Oily Liquid Wastes, Non-Oily Liquid Wastes, Solid
 Wastes, Oily Solid/Semi-Solid Wastes, Non-Oily Solid/Semi-Solid Wastes) and
 disposed of as dictated by local, state, or federal requirements.

• The Facility's Disposal Plan is provided in Appendix C.

2.6 PREVENTION

In addition to being prepared to respond to an oil spill, the Facility also has prevention measures in place to minimize the chances of an accidental discharge. The Facility discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.), are described as follows:

- The Company's training and briefing program ensures oil-handling personnel are familiar with the Plan and are capable of reporting a discharge (see Section 3).
- The Facility has been designed, and is maintained, in order to prevent discharges as described in this Plan (see Sections 4, 5, 6 and 7).
- Loading/unloading measures ensure that trucks are safely loaded or unloaded (see Section 7).
- Security measures prevent access by unauthorized persons to the Facility (see Section 8).

SECTION 3.0

TRAINING AND INSPECTIONS

- 3.1 Personnel Training and Spill Prevention Procedures
- 3.2 <u>Inspections, Tests, and Records</u>

3.1 PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

Appropriate training and instruction will be conducted in the areas of:

- 1. General facility operations.
- 2. Operation and maintenance of equipment to prevent discharges.
- 3. Applicable pollution control laws, rules, and regulations.
- 4. The facility SPCC Plan.
- 5. Inspection procedures.
- 6. Responsibilities in the notification process in the event of a discharge.
- 7. Discussion/description of known discharges, failures, malfunctioning components, and any recently developed precautionary measures.
- 8. All changes pertaining to the above items.

Once a calendar year, the SPCC plan will be reviewed by the plant manager and all production, blending and maintenance supervisors and cover the above items. Supervisors are responsible for reviewing the SPCC plan with all blending and maintenance personnel and documenting that this has been accomplished. All new personnel will be trained as they enter positions where they will have discharge prevention responsibilities.

The overall formal review sessions will be held as soon as practical after the annual SPCC inspection of tanks, pipelines, etc., and will include the results of the inspection.

Revision Date: June, 2013

3.2 INSPECTIONS, TESTS, AND RECORDS

The following items will be maintained on file at the facility:

- 1. A current list of bulk tanks, locations, and capacities.
- 2. A record of all repairs to pipelines, tanks, and containment devices.
- 3. A record of the daily and annual inspection of tanks, pipelines and ancillary equipment will be maintained. Complete records of daily tank inspections will be maintained for 3 months. After this period of time, records sufficient to document the performance of weekly inspections will be maintained for three years to minimize record keeping activities.
- 4. A record of discharges reported to federal, state and local agencies. This record will include details of the cause of the discharge, how the discharge was cleaned up and actions taken to prevent the discharge from occurring again.
- 5. A record of disposal of oil resulting from discharges. This record will include oil that may be disposed of as well as oil returned to stock.
- 6. All engineering changes made to any of the aforementioned facilities or systems shall be maintained as a matter of record.
- 7. A record of training activities and personnel involved.
- 8. A copy of the facility's current SPCC plan.

All of the above records shall be maintained for a minimum of three years from the date of documentation.

4.0 Facility Drainage Version : 1.2.0

SECTION 4.0

FACILITY DRAINAGE

- 4.1 **Diked Storage Area Drainage**
- 4.2 Undiked Area Drainage
- 4.3 <u>Effluent Treatment Facilities</u>

4.0 Facility Drainage Version : 1.2.0

4.1 DIKED STORAGE AREA DRAINAGE

Indoor

There are two (2) operational floor drains located indoors at this facility location. One is located in a restroom near the packaged truck shipping and receiving dock and the other is located in the Boiler House. These drains lead to the sanitary sewer. All other floor drains have been sealed.

Outdoor

The facility has three NPDES outfalls. These locations are illustrated as S1, S2 and S3. Valves at collection basins or in the outfalls enable authorized personnel to discharge storm water when certain NPDES and SWPCP conditions have been satisfied. All valves are locked closed except when releasing storm water.

Discharges of storm water from the outfalls are conducted in accordance with requirements in the State of Oregon General Permit 1200-COLS. Compliance activities include periodic sampling and visual observations of the discharge points.

As stipulated in the permit, accumulated rainwater is allowed to drain only after a visual inspection has determined that pollutants are not present. If visual evidence of contamination such as an oil and/or grease sheen is present, it will be removed by use of sorbent material, pumping, etc. Residues from this activity, such as spent sorbent, etc., will be properly disposed of or recycled off site. The facility's SWPCP contains specific requirements regarding storm water discharge at the facility.

In addition, all storm water releases from the AST containment areas are documented in accordance with requirements of the SWPCP. A discharge log documenting releases from the AST containment area is maintained at the facility.

At the loading/unloading docks, bulk product transfers are not allowed while drains are releasing storm water. In the event of an oil discharge anywhere on the property, responsible personnel (listed elsewhere) will immediately verify that all valves and drainage devices are closed to ensure they the discharge does not migrate off-site.

4.2 UNDIKED AREA DRAINAGE

Undiked areas, transfer areas and mobile storage locations are provided general containment by surface topography. Drainage is either towards the Facility from surrounding areas or drain toward berms, curbed areas, or drainage troughs, which are located on-site.

4.3 EFFLUENT TREATMENT FACILITIES

The Facility does not have an Effluent Treatment Facility.

5.0 Bulk Storage Containers

SECTION 5.0

BULK STORAGE CONTAINERS

- **5.1 Container Design and Construction**
- **Secondary Containment**
- 5.3 Completely or Partially Buried Metallic Storage Tanks
- 5.4 Mobile or Portable Oil Storage Tanks
- 5.5 <u>Internal Heating Coils</u>
- **5.6 Container Inspection Programs**

5.1 CONTAINER DESIGN AND CONSTRUCTION

All tanks are constructed of a welded steel. They are designed, operated and maintained to prevent/avoid discharges. Tanks satisfy Underwriters' Laboratories Standard UL-142 or API 650 specifications and are designed and constructed in a manner that is appropriate for the materials that they are storing, thereby reducing or eliminating the possibility of undue corrosion, ruptures, etc. All tanks contains lube oils and lube oil additives. There are no materials handled that are corrosive or incompatible with steel.

Outdoor tanks are equipped with either mechanical or electronic high liquid level audible alarms. The mechanical alarms are tested on a weekly basis by manually lifting the float to activate the alarm. A record of the test is noted on the weekly tank/container inventory and inspection report.

All indoor tanks, with the exception of the 100-gallon mixed/flush oil portable tank, are equipped with either mechanical or electronic high liquid level audible alarms. The mechanical alarms are tested on a weekly basis by manually lifting the float to activate the alarm.

5.2 SECONDARY CONTAINMENT

The secondary containment system provided for the aboveground storage containers has the following design and construction characteristics:

- Containment or diversionary structures to prevent oil from reaching navigable waters are practicable.
- All tank farms, transfer areas, and mobile storage areas are constructed so that a secondary
 means of containment is provided for the entire contents of the largest single container plus
 sufficient freeboard to allow for precipitation.
- Berms, dikes, and retaining walls are sufficiently impervious to contain the products stored in each containment area and avoid discharges to navigable waters.
- Areas A and C are a combined containment. Areas B and D are individual containments. Areas A, B, and C are concrete containments. Area D is constructed of compacted earthen material with an earthen floor with sufficiently impervious soil components.
- Containment areas A&C of the tank farm are joined by five 18" diameter concrete culverts sloping 1" in 10' toward each section for drainage. The culverts increase the containment capacity for both compartments A & C. The culverts are set in crushed rock and rest on an existing concrete slab. Seepage at the ends of the ramp crossing the culverts is prevented by pouring the 7" top slab onto the existing concrete slab. The yard walls are connected to the 7" top slab.
- A discharge from a container or piping within the containment areas will be contained until clean up occurs.

In addition to the containment system, the Facility has a strong tank integrity program which significantly increases the chances of detecting corrosion or anomalies in the tank shell before it becomes compromised. More detail on the tank integrity program is provided later in this section.

Portland Packaging Plant SPCC Revision Date: June, 2013

5.3 COMPLETELY OR PARTIALLY BURIED METALLIC STORAGE TANKS

Underground Lines

The only location at the facility with underground lines is the bulk loading rack. Pipelines in this area travel underground between the two sections of the tank farm (North and West) to the blending area. Their underground portions pass below the concrete driveway at the bulk loading rack. A total of 28 underground lines are present with lengths ranging from 24 feet to 85 feet.

These underground pipelines will be subjected to periodic integrity testing such as tightness testing on a frequency of once every 5 years. This testing program was put into place in 2001. The lines are wrapped to protect against corrosion where they contact the concrete paving; however they are not provided with cathodic protection. Soil corrosivity conditions, as well as the physical condition of a representative number of lines (14) unearthed and inspected/evaluated in 2001 did not warrant that cathodic protection be put into place for additional corrosion protection.

If buried piping is exposed for any reason at the facility, it will be inspected for deterioration. If corrosion damage is found, the facility will undertake additional examination and corrective action as indicated by the magnitude of the damage, as needed. If buried piping is modified, relocated or replaced, it will undergo integrity and leak testing procedures.

If buried piping is installed in the future, it will be installed with a protective wrapping and coating. It will also be cathodically protected and under go integrity and leak testing prior to being placed into service.

5.4 MOBILE OR PORTABLE OIL STORAGE TANKS

Temporary outdoor portable storage containers are located adjacent to the property line south and west of the main building in the parking lot. The containers are used to temporarily store 55-gallon drums, 5-gallon pails and cased packaged goods.

Containment in this area is provided by controlled drainage in the parking area. The parking area is graded to keep all releases on-site. All drains are equipped with closed and locked valves that make sure releases are contained on-site until they can be cleaned-up. In addition, spill response equipment is maintained near this area. Personnel are trained to use this equipment to contain any unexpected incidental releases in this area.

In a worse case scenario a 55-gallon drum could rupture resulting in a product release of 55 gallons. In the event of an unexpected release in this area, the release will migrate into the parking area south and west of the main building. Since the drains that are located in the parking area are equipped with the closed valves, any release will be contained in the parking area until it is cleaned up. Small incidental releases will be cleaned up with mops, pumps, pads, and/or sorbent material by qualified personnel and disposed of off-site. Larger discharges that cannot be cleaned-up by on-site personnel will be removed by spill response contractors.

Mixed or flush oil at this facility is stored inside the main building in 330-gallon totes and in 55-gallon drums. Mi ed or flush oil is also located in the manufacturing area (blending area) in a 100 gallon portable AST. Floor drains are not located near these areas.

The walls of the building in these areas provide some degree of secondary containment. In addition, spill response equipment is maintained near these areas. Personnel are trained to use this equipment to contain any unexpected incidental releases in this area. Secondary containment is

5.0 Bulk Storage Containers Version : 1.2.0

provided by controlled drainage in the parking area adjacent to the building. The parking area is graded to keep all releases on-site. All drains are equipped with closed and locked valves that make sure releases are contained on-site until they can be cleaned-up.

5.5 INTERNAL HEATING COILS

Internal heating coils are utilized on some blending kettles and all steam condensate is managed onsite.

5.6 CONTAINER INSPECTION PROGRAMS

Inspection of the exterior of the tanks, tank cars, pipelines and ancillary equipment, pumps and secondary containment areas is accomplished on a daily basis through visual inspection. Equipment is inspected for signs of deterioration, leaks that might cause a discharge, and accumulation of oil around tanks or pipe racks (see Appendix A).

Additionally, supervisory personnel formally inspect the tanks once each year. Items in need of repair are reported to a supervisor, documented using a work order system and promptly repaired. Repairs are documented on a work order system.

If a field-constructed aboveground tank undergoes one of the following, the tank will be evaluated for risk of discharge or failure due to brittle fracture (or other catastrophe) and appropriate action will be taken, as necessary, to prevent a discharge or failure:

- Repair
- Alteration
- Reconstruction
- Change in service that might affect the risk of a discharge or failure due to brittle failure
- Discharge of oil or failure due to brittle fracture failure (or other catastrophe)

INSPECTION TYPE	FREQUENCY	INSPECTOR QUALIFICATION OR TRAINING	DOCUMENTATION	RECORD RETENTION
External Inspection - API 653 (in- service)	Lesser of 5 years OR 1/4 of the life of the shell	API 653 Certified Inspector	API 653 Certified Report	Life of the Tank
API 653 - Ultrasonic Testing of the Shell (in- service)	Lesser of 15 years OR 1/2 the life of the shell	Level II or Level III of ASNTSNT- TC - IA (See API 650 paragraph 6.3.2, 10 edition, Addendum 3)	API 653 Certified Report	Life of the Tank
Internal Inspection - API 653 (out- of-service)	Lesser of 10 years OR the life of the tank bottom	API 653 Certified Inspector	API 653 Certified Report	Life of the Tank

5.0 Bulk Storage Containers Version : 1.2.0

AST Type and Size	(U.S. gallons)	Category 1	Category 2	Category 3
	0 - 1100 (0-4164 liters)	Р	Р	Р
	1101 - 5,000 (4168 - 18,927 liters)	Р	P, E&L(10)	[p, E&l(5), 1(10] OR [P, L(2), E(5)]
Shop - Fabricated ASTs	5,001 - 30,000 (18,931 - 113,562 liters) 30,001 - 50,000 (113,566 189,271 liters)	P,E(20) P,E(20)	[(P, E(10), 1(20)] or [(P, E(5), L(10)] P, E&L(5), 1(5)	[(P, E(10), 1(20)] or [(P, E(5), L(10)] P, E&L(5), 1(5)
Portable Containers		Р	Р	Р

Category 1 - ASTs with spill control, and with Continuous Release Detection Method (CRDM)

Category 2 - ASTs with spill control and without CRDM

Category 1 - ASTs without spill control and without CRDM

P - Periodic AST inspection

E - Formal external inspection by certified inspector

I - Formal internal inspection by certified inspector

L - leak test by owner or owner's designee

() indicates maximum inspection internal in years. For example, E (5) indicates formal external inspection every 5 years.

SECTION 6.0

TRANSFER OPERATIONS, PUMPING, AND IN-TERMINAL PROCESS

- **6.1 Buried Piping Installations**
- 6.2 Out-of-Service Pipelines
- 6.3 Aboveground Valves and Pipelines
- 6.4 Vehicle Warning Procedures

6.1 BURIED PIPING INSTALLATIONS

The only location at the facility with underground lines is the bulk loading rack. Pipelines in this area travel underground between the two sections of the tank farm (North and West) to the blending area. Their underground portions pass below the concrete driveway at the bulk loading rack. A total of 28 underground lines are present with lengths ranging from 24 feet to 85 feet.

These underground pipelines will be subjected to periodic integrity testing such as tightness testing on a frequency of once every 5 years. This testing program was put into place in 2001. The lines are wrapped to protect against corrosion where they contact the concrete paving; however they are not provided with cathodic protection. Soil corrosivity conditions, as well as the physical condition of a representative number of lines (14) unearthed and inspected/evaluated in 2001 did not warrant that cathodic protection be put into place for additional corrosion protection.

6.2 OUT-OF-SERVICE PIPELINES

All loading/unloading connections of pipelines will be secured when out-of-service. If buried piping is exposed for any reason at the facility, it will be inspected for deterioration. If corrosion damage is found, the facility will undertake additional examination and corrective action as indicated by the magnitude of the damage, as needed. If buried piping is modified, relocated or replaced, it will undergo integrity and leak testing procedures.

If buried piping is installed in the future, it will be installed with a protective wrapping and coating. It will also be cathodically protected and undergo integrity and leak testing prior to being placed into service.

6.3 ABOVEGROUND VALVES AND PIPELINES

With the exception of the locations stated above, all other pipelines are aboveground and easily inspected. When a pipeline is not in service or standby service, the terminal connection at the transfer point will be capped or blank-flanged. Starter controls for pumps that handle pipelines, are within the locked confines of the building. Pipe supports and racks are properly designed to minimize abrasion and corrosion, and to allow for expansion and contraction. There are valves present at each tank that are kept closed and locked when in a non-operating, standby status.

Aboveground pipelines and ancillary equipment are visually inspected. These inspections include an evaluation of the general condition of the following items (as applicable):

- Piping
- Pumps
- Flange joints
- Expansion joints
- Valve glands and bodies
- Catch pans
- Pipeline supports
- Metal surfaces of these types of equipment

These inspections are documented at least once a week by completing a "Weekly Storage Tank/Container Inventory and Inspection Report" checklist.

6.4 VEHICLE WARNING PROCEDURES

Pipelines within the tank farm areas are not exposed to vehicular traffic through good engineering controls. Exterior pipelines from the loading/unloading racks are protected from vehicular traffic through elevation and placement of the pipelines. A break in these lines would be easily detected since loading/unloading is a monitored operation. Also, there are check valves present on many of the systems to prevent a tank from back draining through an open line. All interior manifolds and piping are exposed for easy visual inspection.

SECTION 7.0

TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

- 7.1 Facility Operations
- 7.2 <u>Loading/Unloading Procedures</u>
- 7.3 Loading/Unloading Rack Containment System

7.1 FACILITY OPERATIONS

Tank trucks load and unload in the north central area between the two sections of the tank farm and the main building. The capacity of the largest truck compartment in this area is 5,000 gallons.

Rail car unloading takes place on the western border of the facility, adjacent to the western section of the tank farm. The maximum capacity of the largest rail car loaded/unloaded in this location is 26,000 gallons. A rail car may load or unload at almost any point along the tank farm.

The Package Truck Loading/Unloading Area is utilized for loading and unloading of the following packaged products: cased motor oil, 330-gallon totes (portable tanks), 55-gallon drums, 16-gallon kegs and 5-gallon pails. Common carrier freight trucks and companyowned package trucks use these docks.

The 330-gallon totes are filled while on the delivery trucks. Filling takes place at the tote filling dock on the western side of the main building. This area is capable of containing the contents of the largest single container, a 330-gallon tote. This containment will prevent any releases from migrating off-site. The walls of the building provide some degree of secondary containment. In addition, spill response equipment is maintained throughout the building. Personnel are trained to use this equipment to contain any unexpected incidental releases in this area. Secondary containment is provided by controlled drainage in the parking area adjacent to the building. The parking area is graded to keep all releases on-site. All drains are equipped with closed and locked valves that make sure releases are contained on-site until they can be cleaned-up.

7.2 LOADING/UNLOADING PROCEDURES

The driver, operator or attendant of any rail car or tank truck, in conjunction with the gauger, shall determine the unfilled capacity of the receiving storage tank, truck or rail car by a suitable gauging device. To prevent overfilling, he/she will not deliver in excess of that amount. Rail cars or tank trucks are not allowed to remain connected to any transfer line when the plant is unattended. The loading rack is equipped with Scully equipment to prevent overflow of the tank truck compartments during loading of finished product. The Scully system operates through the use of probes that are present in each compartment of the trucks being filled. When the product in the compartment contacts the probe, the pump transferring product to that compartment is automatically shut-off.

Signs are posted cautioning tank truck drivers to assure complete disconnection of hoses prior to vehicular departure. Signs are placed on the rail spurs that indicate when a rail car is involved in a transfer process and cannot be moved by a locomotive. All loading/unloading activity is performed with at least one person in the area at all times.

Prior to departure of any rail car or tank truck, the lower most drain and all outlets of such vehicles are capped and sealed. They are then closely examined for leakage, and if necessary, tightened, adjusted, or replaced to prevent liquid leakage while in transit.

The following procedures will be followed:

1. The loading/unloading area will comply with all applicable Department of Transportation regulations and specifications.

- 2. Signage cautioning staff to make sure that all hoses are disconnected prior to vehicular departure will be posted.
- 3. Vehicles will be chocked.
- 4. Drip pans will be placed under valves and hose connections.
- 5. Loading/unloading of bulk oil will be performed by trained qualified personnel who understand the loading/unloading process and how to respond to an incidental release. During loading/unloading operations, a facility person will attend the vehicle for the duration of the transfer. Should a discharge occur, the attendant would shut off pumps and valves in order to stop the discharge.
- 6. All valves and connections will be secured before allowing the vehicle to leave.

7.3 LOADING/UNLOADING RACK CONTAINMENT SYSTEM

The tank truck loading/unloading area is located between the two sections of the tank yard approximately 120' south of North Columbia Boulevard and approximately 180' west of North Commercial. The covered truck loading rack has a sloped bay. The truck unloading rack has a containment under the scale and the drain valve is always closed. The volume of each containment is greater than 8,500 gallons, which is the volume of the largest truck that uses the truck rack. There is an asphaltic berm approximately 188' to the south of Columbia Blvd. between a firewall and an existing building.

8.0 Security Version : 1.2.0

SECTION 8.0

SECURITY

8.1	Fences and Entrance Gates
8.2	Oil and Oil Product Storage Tank Valves
8.3	Oil and Oil Product Pump Starter Controls
8.4	Loading/Unloading Connections

Facility Lighting

8.5

8.0 Security Version: 1.2.0

8.1 FENCES AND ENTRANCE GATES

The property is fenced. Electric gates provide access to authorized personnel. All property entrances are locked when the facility is not in operation. Entrance doors to the main warehouse building are locked when the plant is not in operation. The facility is equipped with a central station alarm system, that is monitored 24/7. The responsible official at this plant will be contacted if a problem arises.

8.2 OIL AND OIL PRODUCT STORAGE TANK VALVES

Bottom valves on storage tanks are locked closed when not in service.

8.3 OIL AND OIL PRODUCT PUMP STARTER CONTROLS

The power controls for all oil pumps are located in secured area of the site and accessible to authorized personnel only.

8.4 LOADING/UNLOADING CONNECTIONS

The loading/unloading connections of oil pipelines are securely capped or blank-flanged when not in service or standby service. Valves on the receiving lines to the rail cars are provided with chains and padlocks. The padlocks are locked at all times except when the valve is opened for loading or unloading of a rail car.

8.5 FACILITY LIGHTING

Lighting is adequate to illuminate discharges that may occur at night.

APPENDIX A

FACILITY SPECIFIC INFORMATION





























SHELL LUBRICANTS - PORTLAND PACKAGING PLANT WEEKLY INSPECTION CHECKLIST/REPORT



Inspec	ted By:				Supervisor's Signature:			
Date ar	nd Time:				Date:		monent washing a	
	Storage Tank Inspection			tion	Container/Equipment Inspection			
Tank	Any Leaks?	Any Corrosion?	Alarms Function?	Note Any Visible Problems That Need Attention	Equipment Leaks?	Any Corrosion or Indication of Deterioration?	Any Other Problem/Concern with Condition of Container/Equipment?	
K1				5464 (V) (1695 (44 84	Containment Walls	a decentration in		
K2					Pipelines			
КЗ					Ancillary Equipment	^ 3		
K6					Totes			
K7					Drums	*		
K8					Hoses			
К9					Fittings			
K10					Rail Tank Cars	· · · · · · · · · · · · · · · · · · ·		
K11								
T1					<u> </u>			
T2								
Т3								
T4					Stormwater I	Management Insp	ection	
T5							-	
Т6		44,6			Are each of the six stormwater drain	ns clean and free of de	ebris?	
T7					If not, clean and note that stormwate			
Т8				W-100 W-1	Are each of the three outfall valves a		losed and locked?	
T9					If not, lock, and inform your Supervis			
T10		1 1 100		MATERIAL STATE OF THE STATE OF	Are there any other areas of concern		oblem with stormwater	
T11					Management?	Titlat oodid pose a pi	objetti with stormwater	
T12					If so, please note below and inform \$	Supenienr		
T13					r so, please note below and morning	oupervisor.		
T14					Stormwater Notes:			
T15					Cionnatel Notes.			
T16				ALLENON ALLENO	[-	E-		
T17					-	E-		
T18				***		30-		
T19								
T20				10-10-10-10-10-10-10-10-10-10-10-10-10-1				
T21								
T22								
T25					Correct	tive Action Notes		
T26					<u>5511ec.</u>			
T27								
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T31								
T32							· · · · · · · · · · · · · · · · · · ·	
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T35			-					
T36								
T41						- Contract of the Contract of		
T42								
T43								
T44								

Appendix C Disposal Plan Version : 1.2.0

APPENDIX C DISPOSAL PLAN

Click here to View

Disposal Plans

This appendix contains a generic disposal plan that will be used by plant personnel to track and document decisions regarding management of wastes generated during cleanup activities. Waste streams that can be generated during cleanup activities include:

- Recovered product
- Oily wastewater
- Contaminated soil/debris
- Contaminated PPE
- Spent decontamination solutions
- Spent absorbents
- Contaminated Equipment (that cannot be decontaminated)

Oily Waste Flowchart illustrates the steps followed to insure that oily waste is properly handled and disposed of. The state is responsible for making decisions regarding how debris disposal will take place. The regional responder can be contacted through the OERS at 1-800-452-0311 or the WDEM at 1-800-258-5990.

Several commercial methods of waste disposal are available including recycling/reuse, off-site treatment, on-site treatment, landfilling and thermal desorption. The following paragraphs contain information on each of these methods.

Recycling/Reuse

Recycling or reuse of the spilled product is the preferred end result of oil spill cleanup and disposal operations. Oregon DEQ's Policy for the Disposal of Oiled Debris lists the following Northwest Region resources for reuse and recycling:

Inman Oil Co., Vancouver/Portland Metro Area

Contact: Vern Cresap Phone: (206) 694-2523 (206) 222-1776

Chempro (United Drain Oil), 1-5 Corridor

Contact: Jim Redfem Phone: (206) 835-8743

• Fuel Processors, Oregon

Contact: Bill Briggs

Phone: (503) 286-8352

(800) 367-8894

Harbor Oil (Dobbins Oil), Oregon

Contact: Jim Dornbirer Phone: (503) 285-9411

(503) 285-4648

• SunWest Oil, Oregon

Contact: Gary McAuley Phone: (503) 223-4224

Off-Site Treatment

Off-site treatment options include physical, chemical and biological treatment processes. Examples include thermal destruction, controlled burning for energy recovery, stabilization/fixation, and bioremediation. Treatment standards and restrictions are complex and are handled by the Environmental Coordinator.

Site Treatment

On-site treatment options are generally limited by practical constraints such as time schedules and costs. On-site treatment options include filtration, phase separation, bioremediation, and on-site fixation/stabilization. On-site treatment options shall be considered by the Environmental Coordinator.

Landfilling

Non-recyclable waste or treatment residues that are determined to be dangerous or hazardous will need to be disposed of at a Class /landfill. Landfill designation is selected only for wastes that are unacceptable for all other disposal options. Approval and acceptance for disposal requires preparation of a Waste Product Questionnaire by the facility Environmental Coordinator and is at the sole discretion of the Class I landfill operator. In Oregon, there is only one such landfill.

Chemical Waste Management, Northwest

Location: Arlington, Oregon Phone: (503) 454-2643

Special wastes, including spent sorbents, contaminated soils, and other debris contaminated with petroleum product generated during oil spill cleanup operations can be sent to Hillsboro Landfill in Hillsboro, Oregon. Hillsboro Landfill general information follows:

Hillsboro Landfill, Inc.

Location: 3205 SE Minter Bridge Road

Hillsboro, Oregon 97123

Phone: (503) 640-9427

Addttionally, Oregon Hydrocarbon, Inc. can accept petroleum-contaminated soils for treatment using their low temperature thermal desorption unit for an environmentally responsible treatment method. Oregon Hydrocarbon's general information:

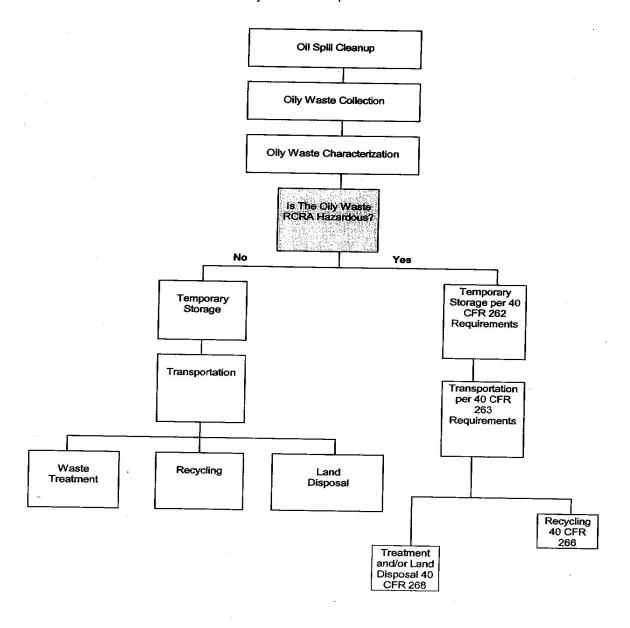
Oregon Hydrocarbon, Inc.

Location: 9333 N. Harborgate Street, PO Box 83685

Pori/and, Oregon 97283

Phone: (503) 735-9525

Oily Waste Disposal Flowchart



SHELL LUBRICANTS PORTLAND PACKAGING PLANT WASTE DISPOSAL PLAN

Source of Release:Amount of Release: Prepared by: Disposal Priorities Step One - Identify and list waste streams that will be generated by response activities Waste Stream	Date:	Location:	
Prepared by: Disposal Priorities Step One - Identify and list waste streams that will be generated by response activities Waste Stream Federal or State If hazardous waste, list waste codes	Source of Release:		
Disposal Priorities Step One - Identify and list waste streams that will be generated by response activities Waste Stream Federal or State If hazardous waste, list waste codes			
Step One - Identify and list waste streams that will be generated by response activities Waste Stream Federal or State If hazardous waste, list waste codes	1 2		
Step One - Identify and list waste streams that will be generated by response activities Waste Stream Federal or State If hazardous waste, list waste codes			
Step One - Identify and list waste streams that will be generated by response activities Waste Stream Federal or State If hazardous waste, list waste codes	Disposal Priorities		
Waste Stream Federal or State If hazardous waste, list waste codes	Z ISPOSMI I I IOI III S		
Waste Stream Federal or State If hazardous waste, list waste codes	Step One - Identify and list wa	ste streams that will be generated by	v response activities
, and the second	soop one ruently und use we	soe sur carris criat with so generation sy	Tesponso working
, and the second	Waste Stream	Federal or State	If hazardous waste, list waste codes
	waste stream		ii iidzardods waste, iist waste codes
		Hazardous Waste:	

Note: Include the following as applicable: recovered product, oily water, contaminated equipment, contaminated PPE, spent decontamination solutions, spent absorbents, contaminated soil/sediment

Step 2 - Determine temporary containment methods

Waste Stream	Method of temporary containment (drums, roll- offs, tanks, etc.)	Estimated containment capacity required for temporary storage (provide units)	Containers to be furnished by:

Step ${\bf 3}$ - Identify disposal methods/firms and determine testing requirements

Waste Stream	Disposal method (recycling, incineration, landfilling, etc.)	Disposal firm to be used	Type of characterization data required for disposal approval	Type of data to be provided - MSDS, representative data, lab tests (list lab analyses required)

Step 4 - Laboratory to perform analyses:

Name:
Address:
Phone:
Contact Person:
Date sample(s) shipped:
Date analytical data received:

Step 5 - Identify Permit/Approvals that will be required for disposal

Waste Stream	Agency	Date paperwork submitted and	Date permit/	Approval forms	If yes, list date submitted and	Date approval
	permit/approval	name of agency contact person		required by	disposal vendor contact person	received
	required for		received	disposal firm?		
	disposal? If yes,					
	list type of					
	paperwork					

Step 6 - Track off-site shipments of waste

Waste Stream	Date Shipped Off-site	Transporter used	Disposal Firm used	Quantity Shipped (units)	Manifest #

APPENDIX D

SUPPORTING DOCUMENTS

CROSS REFERENCE

	U.S. EPA - SPCC 40CFR § 112.3,5,7,8	
40 CFR § 112	BRIEF DESCRIPTION	SECTION
112.3	Requirement to prepare and implement a Spill Prevention Control and Countermeasure Plan	
(a,b,c)	Owners or operators must prepare and implement a Plan	§1.5
(d)	A licensed Professional Engineer must review and certify a Plan for it to be effective	PE Certification Page
(e)	Maintain a complete copy of the Plan at the facility is normally attended at least 4 hours per day, or at the nearest field office	§1.3
112.5	Amendment of Spill Prevention Control and Countermeasures Plan by owners or operators	
(a)	Amend the SPCCwhen there is a change in facility design, construction, operation or maintenance which materially affects the facility's potential for the discharge of oil	§1.4
(b)	complete a review and evaluation of the SPCC at least once every five years amend the SPCC within six months of the reviewimplement within six months of preparation of any amendment.	§1.4
(c)	Have a Professional Engineer certify any technical amendment	§1.4
112.7	Guidelines for the preparation and implementation of a Spill Prevention Control and Countermeasures Plan	
	must prepare a Planhave full approval of managementin writing.	Management Approval Page, Entire Plan
	If the plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, these items should be discussed in separate paragraphs, and the details of installation and operational start-up should be explained separately.	N/A
	follow the sequence specified (or cross-reference)	Cross Reference
(a)(2)	Comply with all applicable requirements in this part [or] state reasons for non-conformance and describe alternate methods	Entire Plan
(a)3)	Describe physical layout and include diagram	§ 1.1, App. A
(a)(3)(i)	[address in your Plan] the type of oil in each container and its capacity	App. A
(a)(3)(ii)	discharge prevention measures including routine handling of products	§ 2.6
(a)(3)(iii)	Drainage or discharge controls and procedures for control of a discharge	§ 4.2
(a)(3)(iv)	Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor)	§ 2.1
(a)(3)(v)	Methods of disposal of recovered materials	§ 2.5, App. C

	U.S. EPA - SPCC 40CFR § 112.3,5,7,8 (Cont'd)	
40 CFR § 112	BRIEF DESCRIPTION	SECTION
(a)(3)(vi)	Contact list and phone numbers	§ 2.2, 2.3, Fig. 2.1 Fig. 2.2
(a)(4)	Relate information [on a discharge]	Fig. 2.3
(a)(5)	Organize portions of the Plan that will make them readily usable	Section Dividers
(b)	Where experience indicates a reasonable potential for equipment failure include in your Plan a prediction of the direction, rate of flow, and total quantity of oil	Арр. А
(c)(1)(i-vii)	Onshore facilities. Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in §112.1(b), except as provided in paragraph (k) of this section for qualified oil-filled operational equipment, and except as provided in §112.9(d)(3) for flowlines and intra-facility gathering lines at an oil production facility. The entire containment system, including walls and floor, In determining the method, design, and capacity for secondary containment, you need only to address the typical failure mode, Secondary containment may be either active or passive in design. At the minimum, you must use one of the following prevention systems	§ 5.2
(c)(2)(i-ii)	Offshore Facilities.	N/A
(d)	If you determine that the installation of structures or equipment listed in paragraphs (c) and (h)(1) of this sectionis not practicableclearly explain in your Planand provide	N/A
(d)(1)	A strong oil spill contingency plan following 40 CFR 109.	N/A
(d)(2)	A written commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.	N/A
(e)	Inspections and records	
	in accordance with written procedures that you or the certifying engineer developwith the SPCC Plan for a period of three years.	§ 3.2
(f)	Personnel, training and spill prevention procedures	
(f)(1)	train your oil-handling personnel in the operation and maintenance of equipment to prevent the discharges	§ 3.1
(f)(2)	Designate a personaccountable for oil spill prevention	Management Approval Page
(f)(3)	Schedule and conduct spill prevention briefings highlight and describe known spill dischargesor failures, malfunctioning components, and recently developed precautionary measures.	§ 3.1
(g)	Security (excluding oil production facilities)	§ 8.0

	U.S. EPA - SPCC 40CFR § 112.3,5,7,8 (Cont'd)					
40 CFR § 112	BRIEF DESCRIPTION	SECTION				
(h)(1-3)	Facility tank car and tank truck loading/unloading rack Where loading/unloading rack drainage does not flow into a catchment basin or treatment facility designeddesign any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility. Provide an interlocked warning light or physical barrier system, Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles should be closely examined for leakage,	§ 7.0				
(i)	If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure due to brittle fractureevaluate the container for risk	§ 5.6				
(j)	In additioninclude a complete discussion of conformance with applicable requirementsor any more stringent, with State rules, regulations and guidelines.	§ 1.6				
(k)	Qualified Oil-filled Operational Equipment. The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this subsection may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section.	N/A				
(k)(1)	Qualification Criteria—Reportable Discharge History: The owner or operator of a facility that has had no single discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan certification date, or since becoming subject to this part if the facility has been in operation for less than three years (other than oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war or terrorism); and	N/A				
(k)(2)	Alternative Requirements to General Secondary Containment. If secondary containment is not provided for qualified oil-filled operational equipment pursuant to paragraph (c) of this section, the owner or operator of a facility with qualified oil-filled operational equipment must:					

U.S. EPA - SPCC 40CFR § 112.3,5,7,8 (Cont'd)				
40 CFR § 112	BRIEF DESCRIPTION	SECTION		
(k)(2)(i)	Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge; and	N/A		
(k)(2)(ii)	Unless you have submitted a response plan under §112.20, provide in your Plan the following:	N/A		
(k)(2)(ii)(A)	An oil spill contingency plan following the provisions of part 109 of this chapter.	N/A		
(k)(2)(ii)(B)	A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.	N/A		
112.8	Spill Prevention, Control, and Countermeasure Plan requirements for onshore facilities (excluding production facilities)			
(a)	Meet the general requirements for the Plan listed under § 112.7, and			
(b)(1)	Restrain drainage from diked storage areas by valves or other positive means to prevent a spillinto the drainage system or inplant effluent treatment system, except where plan systems are designed to handle such leakage. You may empty diked areas by pumps or ejectors; however you must be manually activate these pumpsand inspect the condition of the accumulation before starting	§ 4.1, § 4.2		
(b)(2)	Use valves of manual, open-and-closed design If facility drainage drains directly into water courseyou must inspect and drain uncontaminated retained stormwater, as provided inparagraphs (c)(3)(ii)(iii), and (iv).	§ 4.1, § 4.2		
(b)(3)	Design facility drainage systems from undiked areas to flow into ponds, lagoons or catchment basins, designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding.	§ 4.2		
(b)(4)	Ifnot engineered as in paragraphs (b)(3), equip the final discharge of all ditches with a diversion system that wouldretain the oil in the facility.	§ 4.2		
(b)(5)	Where drainage waters are treated in more than one treatment unit provide two "lift" pumps and permanently install at least one of the pumps. Whatever techniques are used, facility drainage systems engineer to prevent a discharge as described in § 112.1(b) in case there is an equipment failure or human error	N/A		
(c)	Bulk storage containers (onshore)			
(c)(1)	Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage	§ 5.1		

U.S. EPA - SPCC 40CFR § 112.3,5,7,8 (Cont'd)				
40 CFR § 112	BRIEF DESCRIPTION	SECTION		
(c)(2)	Construct all bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.	§ 5.1, App. A		
(c)(3)	Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent discharge into an open water course, lake, or pond, bypassing the in-plant treatment system unless you:			
(c)(3)(i)	Normally keep the bypass valve sealed closed.	§ 8.2		
(c)(3)(ii)	Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in § 112.1(b).	§ 4.1, § 4.2		
(c)(3)(iii)	Open the bypass valve and reseal it following drainageunder responsible supervision.	§ 5.2		
(c)(3)(iv)	Keep adequate records of such events.	§ 3.0		
(c)(4)	Protect any completely buried metallic storage tank installed on or after January 10,1974 from corrosion by coatings or cathodic protection	N/A		
(c)(5)	Not use partially buried metallic tanks for the storage of oil unless the buried section of the tank is adequately coated	N/A		
(c)(6)	Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph.	§ 3.2		

U.S. EPA - SPCC 40CFR § 112.3,5,7,8 (Cont'd)				
40 CFR § 112	BRIEF DESCRIPTION	SECTION		
(c)(7)	Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines	§ 5.5		
(c)(8)	Engineer or update each container installation in accordance with good engineering practice to avoid discharges (and) provide at least one of the following devices:			
(c)(8)(i)	High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities, an audible air vent may suffice.	§ 5.1		
(c)(8)(ii)	High liquid level pump cutoff devices set to stop flow at a predetermined container content level.	N/A		
(c)(8)(iii)	Direct audible or code signal communication between the container gauger and the pumping station.	N/A		
(c)(8)(iv)	A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges.	N/A		
(c)(8)(v)	You must regularly test liquid level sensing devices to ensure proper operation.	§ 5.1		
(c)(9)	Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge	N/A		
(c)(10)	Promptly correct visible discharges which result in a loss of oil from container includingseam, gaskets, piping, pumps, valves	§ 5.1		
(c)(11)	Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). Except for mobile refuelers and other non-transportation-related tank trucks, you must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.	§ 5.4		
(d)	Facility transfer operations, pumping, and facility process			
(d)(1)	Provide buried piping installed or replaced on or after August 16, 2002, with a protective wrapping and coatingcathodically protect. If a section of buried line is exposedcarefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated	§ 6.1		
(d)(2)	Cap or blank-flange the terminal connectionand mark it as to origin when piping is not in service, or in standby service for an extended time.	§ 6.2, § 8.4		
(d)(3)	Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.	§ 6.3		

U.S. EPA - SPCC 40CFR § 112.3,5,7,8 (Cont'd)				
40 CFR § 112	BRIEF DESCRIPTION	SECTION		
(d)(4)	Regularly inspect all aboveground valves, piping, and appurtenancesalso conduct integrity and leak testing on buried piping at the time of installation, modification, construction, relocation, or replacement.	§ 3.2		
(d)(5)	Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.	§ 6.4		